

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Eugene Westmoreland,	)
	)
	)
<i>Plaintiff,</i>	)
	)
-vs-	) No. 23-cv-1851
	)
Thomas Dart, Sheriff of Cook	) Judge Tharp Jr.
County, et al.,	)
	)
	) Magistrate Judge Gilbert
<i>Defendants.</i>	)

**PLAINTIFF'S INSPECTION REQUEST**

Plaintiff, by counsel, and pursuant to Rule 34(a)(2) of the Federal Rules of Civil Procedure requests to enter the Cook County Department of Corrections on or before June 23, 2023 to inspect, measure, survey, and photograph the following:

- a) The two pedestrian tunnels connecting the Residential Treatment Unit (RTU) to the adjacent buildings at the Cook County Department of Corrections. *See* Dkt. 8-2, Printout from Walsh Construction regarding the New RTU-RCDC Facility; and
- b) The ramp(s) in Division 4 of the Cook County Department of Corrections that plaintiff Westmoreland navigated on

February 18, 2023 when he was transported from RTU to vote. A screenshot of at least one ramp is depicted below:



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*an attorney for plaintiff*

Patrick W. Morrissey  
Thomas G. Morrissey, Ltd.  
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Chicago, Il. 60643  
(773)233-7901

## CERTIFICATE OF SERVICE

I, Patrick W. Morrissey, state that on May 30, 2023, I served the foregoing by email to the attorney listed below:

Jason E. DeVore  
Troy S. Radunsky  
Zachary Stillman  
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